



United States Attorney
Eastern District of New York

BWB/AEG/MBM
F.#2010R00172

271 Cadman Plaza East
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June 12, 2011

By ECF and Electronic Mail

Deborah Colson, Esq.
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10 E. 40th Street, Suite 3307
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Re: United States v. Mohammed Wali Zazi
Criminal Docket No. 10-60 (S-1)(JG)

Dear Counsel:

The government writes to provide additional disclosures pursuant to Rule 16. At trial, the government anticipates calling one or more witnesses who would testify that after Najibullah Zazi returned from Pakistan in 2009, the defendant learned that Najibullah, and the other individuals with whom he was traveling, had traveled to Waziristan. The defendant later conspired with others to conceal that fact from the FBI and Grand Juries in Colorado and the Eastern District of New York.

Additionally, pursuant to Brady v. Maryland, 373 U.S. 83 (1963), the government hereby informs the defense that it may wish to speak to Zaheer Akbar, who has expressed the view that the defendant's English skills are poor.

Very truly yours,

LORETTA E. LYNCH
United States Attorney

By: _____ /s/
Berit W. Berger
Melissa B. Marrus
Andrew E. Goldsmith
Assistant U.S. Attorneys
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cc: Clerk of the Court (JG)(via ECF)